

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

THOMAS M. KELLEY,
Plaintiff,

v.

Civil Action No. 05-10596-NMG

TOWN OF PLYMOUTH, et al
Defendants.

JOINT MOTION TO EXTEND SCHEDULING ORDER DEADLINES

Now come the parties in the above-captioned matter and jointly request this Honorable Court to extend the deadlines of its current Scheduling Order by an additional 30 days to complete depositions. The last order entered granted the parties until February 15, 2007, to complete depositions.

As grounds for their motion, the parties state that they require additional time to complete depositions and discovery. Due to scheduling conflicts, the Plaintiff has not been able to reschedule the deposition of Eleanor Beth, former Town Manager for the Town of Plymouth. Ms. Beth is out of town from January 27, 2007, through mid-February and counsel for the Defendants is out of town the week of February 19 through February 23, 2007. Therefore the parties have scheduled the deposition of Eleanor Beth for February 27, 2007, at 1:00 p.m. In addition, the Defendants' have issued a Keeper of the Records Subpoena to the Plymouth Retirement Board for February 26, 2007, at 10:00 a.m.

The parties will not be prejudiced by this proposed extension. Wherefore the parties respectfully request that this Court amend the Scheduling Order as set forth above.

Respectfully submitted,

Plaintiff, Thomas M. Kelley
By his attorney

Defendant, Town of Plymouth,
By its Attorney

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